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Attorneys for Plaintiff United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
APPROXIMATELY \$141,513.00 IN U.S.  
CURRENCY,  
  
Defendant.

CASE NO. 1:21-MC-00069-AWI-BAM

STIPULATION AND ORDER FURTHER  
EXTENDING TIME FOR FILING A COMPLAINT  
FOR FORFEITURE AND/OR TO OBTAIN AN  
INDICTMENT ALLEGING FORFEITURE

The United States of America and potential claimant Sergiy Krystafovych (“potential claimant”),  
by and through their counsel, do agree and STIPULATE as follows:

1. On or about May 5, 2021, potential claimant filed a claim in the administrative forfeiture  
proceeding with the U.S. Customs and Border Protection with respect to the above-captioned currency  
(hereafter “defendant currency”), which was seized on August 25, 2020.

2. The U.S. Customs and Border Protection has sent the written notice of intent to forfeit  
required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any  
person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other  
than the potential claimant has filed a claim to the defendant currency as required by law in the  
administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of  
2 the parties. That deadline was August 2, 2021.

3 4. By Stipulation and Order filed August 2, 2021, the parties stipulated to extend to October  
4 31, 2021, the time in which the United States is required to file a civil complaint for forfeiture against  
5 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
6 forfeiture.

7 5. By Stipulation and Order filed October 25, 2021, the parties stipulated to extend to  
8 December 30, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
9 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
10 subject to forfeiture.

11 6. By Stipulation and Order filed December 27, 2021, the parties stipulated to extend to  
12 February 13, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
13 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
14 subject to forfeiture.

15 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
16 to March 15, 2022, the time in which the United States is required to file a civil complaint forfeiture  
17 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
18 subject to forfeiture.

19 8. Accordingly, the parties agree that the deadline by which the United States shall be  
20 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment  
21 alleging that the defendant currency is subject to forfeiture shall be extended to March 15, 2022.

22 Dated: February 10, 2022

PHILLIP A. TALBERT  
United States Attorney

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24 By: /s/ Alyson A. Berg  
25 ALYSON A. BERG  
Assistant United States Attorney  
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1 Dated: February 10, 2022

By: /s/ Jakrun Sodhi

JAKRUN SODHI

Attorney for Sergiy Krystafovych  
(As approved by email on 2/10/22)

4 IT IS SO ORDERED.

5 Dated: February 11, 2022

  
SENIOR DISTRICT JUDGE